

THE ETHICAL PRACTICES ATTORNEY – IUOE LOCAL 14-14B

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LOCAL 14-14B OF THE INTERNATIONAL
UNION OF OPERATING ENGINEERS,

Defendant.

Civil Action No. 08-3046-SJ-JMA

GEORGE A. STAMBOULIDIS, Ethical
Practices Attorney for Local 14-14B of the
International Union of Operating Engineers,

Appellee,

v.

JOSEPH RIZZUTO, JR.,

Appellant.

Disc. Pro. No. 11-0007

**DECLARATION OF GEORGE A. STAMBOULIDIS IN SUPPORT OF THE EPA’S
OPPOSITION TO JOSEPH RIZZUTO, JR.’S APPEAL FROM THE DECISION AND
ORDER OF THE HEARING OFFICER**

I, George A. Stamboulidis, hereby declare as follows:

I am the court-appointed Ethical Practices Attorney (the “EPA”) of the International Union of Operating Engineers Local 14-14B (“Local 14”), and a partner in Baker & Hostetler

LLP. I make this declaration to submit the following documents in support of the EPA's Opposition to Joseph Rizzuto, Jr.'s Appeal from the Decision and Order of the Hearing Officer.

Exhibit A is a copy of the March 16, 2010 Letter from George A. Stamboulidis to Joseph Rizzuto, Jr.;

Exhibits B1-B13 & B-Respondent's Exhibit are copies of the exhibits admitted into evidence at Mr. Rizzuto's September 15, 2011 Evidentiary Hearing (Exhibit B-Respondent's Exhibit is to be filed under seal by Mr. Rizzuto's counsel);

Exhibit C is a copy of the EPA's June 16, 2011 Statement of Disciplinary Charges against Mr. Rizzuto (without supporting Declaration and exhibits);

Exhibit D is a copy of Scheduling Order No. 1 issued by Local 14's Hearing Officer Steven C. Bennett on June 20, 2011;

Exhibit E is a copy of the June 24, 2011 Letter from Mr. Stamboulidis to Mr. Bennett;

Exhibit F is a copy of the July 7, 2011 Email from Mr. Rizzuto to Mr. Bennett;

Exhibit G is a copy of the September 12, 2011 Letter from Mr. Stamboulidis to Mr. Rizzuto;

Exhibit H is a copy of the September 13, 2011 Email from Mr. Rizzuto to Mr. Bennett;

Exhibit I is a copy of the September 27, 2011 Email from Mr. Rizzuto to Mr. Bennett; and

Exhibit J is a copy of the October 3, 2011 Email from Mr. Rizzuto to Mr. Bennett.

Pursuant to 28 U.S.C. § 1746, I hereby declare, under penalty of perjury, that the foregoing statements made by me are true and correct.

Dated: New York, New York
March 27, 2012

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LOCAL 14-14B

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